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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

APR 10 1992

In the Matter of

Amendment of Part 80 of
The Commission's Rules
For an Allocation of Frequencies for
Digital Shipboard Earth Stations

Federal Communications Commission
Office of the Secretary

RM-7912

COMMENTS OF THE BELL ATLANTIC COMPANIES¹

The Bell Atlantic Companies submit the following comments in opposition to the Petition for Rulemaking filed by Crescomm Transmission Services, Inc. ("Petitioner") on December 12, 1991 to amend Part 80 of the Commission's Rules and Regulations for an allocation of frequencies for Digital Shipboard Earth Stations.

The Bell Atlantic Companies, under Part 21 of the Commission's Rules, are licensed to provide Domestic Public Fixed Service in their serving areas, in the 2 GHz, 4 GHz, 6 GHz, 11 GHz, 18 GHz, and 23 GHz bands.

Crescomm Transmission Services, Inc. proposes to amend Part 80 to allow licensing the use of Digital Shipboard Earth Stations on board ships within the service area or "foot print" of satellite systems operating in the C-Band and Ku-Band. Specifically, Crescomm seeks a transmit frequency allocation in the

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

5.925-6.425 GHz and 14.000-14.500 GHz and receive frequency allocation in the 3.700-4.200 GHz and 11.700-12.200 GHz band.

The frequencies in question are presently allocated to the Fixed Satellite Service (Part 25) and the Domestic Public Fixed Services (Part 21), as outlined in Section 2.106 of the Commission's Rules. Under these rules, fixed satellite earth stations and terrestrial microwave stations in the 4 GHz and 6 GHz bands are operated on a coprimary basis. Shared use of these bands is accomplished through frequency coordination of fixed services, as outlined in Sections 21.100, 21.706, 25.203, and 25.251 of the Commission's rules.

Crescomm, in neither its petition for rulemaking nor its request for Pioneer's Preference, has made any provision for frequency coordination with other users in the C-Band and Ku-Band. Furthermore, the petitioner fails to address the potential for interference this service might have on the existing "fixed" community.

Bell Atlantic's analysis shows that the operation of shipboard earth stations in the proposed frequency bands could have a significant impact on Bell Atlantic's terrestrial microwave services operating near coastal areas. Moreover, the mobile nature of Crescomm's proposed operation would make the impact of any interference difficult to predict. Furthermore, actual frequency coordination with existing services could prove to be impractical, because the location of shipboard stations cannot be ascertained in advance. The petitioner fails to address these issues.

Frequency coordination procedures enumerated in the Commission's Rules in Sections 21.100(d) and 25.203 have served Part 21 Domestic Public Fixed and Part 25 Fixed Satellite Services users well. These rules have allowed the frequency coordinators to optimize spectrum efficiencies through reuse of the same frequencies many times over the same area. The Crescomm proposal would jeopardize these efficiencies.

Accordingly, Bell Atlantic requests that the Commission either deny the petition of Crescomm Transmission Services, Inc. or hold it in abeyance until such time that Crescomm submits a plan which allows for frequency coordination and provides the required assurance that its proposed service will not cause harmful interference to fixed stations licensed at the same or adjacent frequencies.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

By Their Attorneys

A handwritten signature in dark ink, appearing to read "Lawrence W. Katz", is written over a horizontal line.

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April 10, 1992

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of the Bell Atlantic Companies" was served this 10th day of April, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.



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